

**Supporting Statement A for  
Paperwork Reduction Act Submission**

**LAND AND WATER CONSERVATION FUND STATE ASSISTANCE PROGRAM  
36 CFR 59  
OMB Control Number 1024-0031**

**Note:** The information collection requirements associated with the National Park Service Land and Water Conservation Fund (LWCF) State Assistance Program are currently approved under five OMB control numbers: 1024-0031, 1024-0032, 1024-0033, 1024-0034, and 1024-0047. During our review for this renewal, we discovered some additional requirements that need OMB approval. In this revision of 1024-0031, we are including all of the information collection requirements associated with the LWCF State Assistance Program. If OMB approves this revision, we will discontinue OMB Control Numbers 1024-0032, 1024-0033, 1024-0034, and 1024-0047.

**Terms of Clearance. None.**

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Land and Water Conservation Fund Act of 1965 (LWCF Act) (16 U.S.C 4601-4 et seq.) was enacted to help preserve, develop, and ensure access to outdoor recreation facilities. The LWCF Act provides funds for and authorizes Federal assistance to the States for planning, acquisition, and development of needed land and water areas and facilities. In accordance with the LWCF Act, the National Park Service (we, NPS) administers the LWCF State Assistance Program, which provides matching grants to States and through the States to local units of government. As used in this information collection request, the term "States" includes the 50 States; the Commonwealths of Puerto Rico and the Northern Mariana Islands; the District of Columbia; and the Territories of Guam, the U.S. Virgin Islands, and American Samoa.

LWCF grants are provided to States on a matching basis for up to 50 percent of the total project-related allowable costs. Grants to eligible insular areas may be for 100 percent assistance. The LWCF State Assistance Program gives maximum flexibility and responsibility to the States. States establish their own priorities and criteria and award their grant money through a competitive selection process based on a Statewide Comprehensive Outdoor Recreation Plan. Payments for all projects are made to the State organization that is authorized to accept and administer funds paid for approved projects. Local units of government participate in the program as subgrantees of the State with the State retaining primary grant compliance responsibility.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

We collect the following information for the LWCF State Assistance Program:

**Statewide Comprehensive Outdoor Recreation Plan (SCORP).** (newly identified requirement) The LWCF Act requires that to be eligible for LWCF financial assistance, each

State must prepare and submit to NPS for approval a new or revised SCORP at least once every 5 years. The SCORP must include:

- The name of the State agency that will have the authority to represent and act for the State.
- An evaluation of the demand for and supply of outdoor recreation resources and facilities in the State.
- A program for the implementation of the plan.
- Certification by the Governor that ample opportunity for public participation has taken place in plan development.

**Open Project Selection Process (OPSP).** (newly identified requirement) Each State must develop an OPSP that provides objective criteria and standards for grant selection that are explicitly based on each State's priority needs for the acquisition and development of outdoor recreation resources as identified in the SCORP. The OPSP is the connection between the SCORP and the use of LWCF grants to assist State efforts in meeting high priority outdoor recreation resource needs. To ensure continuing close ties between the SCORP and the OPSP, States must review project selection criteria each time that a new or amended SCORP is approved by the NPS. States must submit to the NPS a revised set of OPSP criteria that conform to any changes in SCORP priorities or submit an appropriate certification that no such revisions are necessary.

**Application.** States may seek financial assistance for acquisition, development, or planning projects to be conducted under the LWCF Act. To receive a grant, States must submit an application to NPS for review and approval. We use the information provided in applications to determine eligibility under the authorizing legislation and to select those projects that will provide the highest return on the Federal investment. Project proposals for LWCF grants comprise the following:

- **Proposal Description and Environmental Screening Form (PD/ESF).** (newly identified requirement) The PD assists the applicant in developing a narrative that provides administrative and descriptive information to help the Federal decisionmaker understand the nature of the proposed project. The ESF indicates the resources that could be impacted by the project, enabling States and/or local project sponsors to more accurately follow an appropriate pathway for compliance with the National Environmental Policy Act (NEPA). The analysis serves as part of the Federal administrative record required by NEPA and its implementing regulations.
- **Project Agreement (Form 10-902).** (Currently approved under OMB Control Number 1024-0033.) This form documents the agreement between the NPS and the State for accomplishing the project. It binds the Federal Government and the State to certain obligations through its acceptance of Federal assistance, including the rules and regulations applicable to the conduct of a project under the Act and any special terms and conditions to the project established by the NPS and agreed to by the State. It obligates the United States to provide grants up to a designated amount for eligible costs; sets forth methods of costing, accounting, incurrence of costs, and similar matters. The form also establishes the project performance period and briefly describes the scope of the project.
- **Description and Notification Form (DNF) (Form 10-903).** (Currently approved under OMB Control Number 1024-0031.) The State must submit a DNF for each project. This form provides data about assisted project sites, such as location, acreages and details

about improvements, as understood at the beginning of each project.

- **Pre-award Onsite Inspection Report.** (Currently approved under 1024-0034.) The State must physically inspect proposed project sites prior to the award of grant funds and report on the findings. The inspection must be conducted in accord with the onsite inspection agreement between the State and NPS. See additional information under Reports, below.
- **Maps and other supporting documentation.** (newly identified requirement) Applicants must develop and submit two maps: one depicting the general location of the park as well as the entrance area; the other delineating the boundaries of the outdoor recreation area that will be subject to the conversion provisions of Section 6(f)(3) of the Act. Applicants should submit other documents that have a significant bearing on the project.

**Grant Amendments.** After initial award but during the award performance period, a State or project sponsor may seek to modify the agreed-upon terms, such as the award end date, the scope of work, or the budget. NPS must review and approve such changes. States must submit an amendment request on behalf of themselves or the local sponsor, which depending on the nature of the change, could comprise the following elements: Amendment to Project Agreement, revised Standard Forms, a letter from the State Liaison Officer (SLO) describing the proposed changes and the impact to the project, the PD/ESF, a revised boundary map, and a revised DNF.

- **Amendment to Project Agreement (Form 10-902A).** (Currently approved under 1024-0033.) An amendment form is required to alter the signed Project Agreement. When the amendment is signed by the NPS, it becomes part of the agreement and supersedes it in the specified matters.
- **Description and Notification Form (Form 10-903).** (Currently approved under 1024-0031.) A revised DNF may be required for changes in scope that alter the planned facility development or the acreage of the site or area to be protected under 6(f).

**Conversions of Use.** (Currently approved under OMB Control Number 1024-0047.) In accordance with section 6(f)(3) of the Act and as codified in 36 CFR 59, no lands acquired or developed with LWCF funds can be converted to other than public outdoor recreation uses unless the NPS approves. States must submit a formal request to the appropriate NPS Regional Office with documentation to substantiate that: (a) all alternatives to the conversion have been evaluated and then rejected on a sound basis; (b) required replacement land being offered as a substitute is of reasonably equivalent location and recreational usefulness as the assisted sites proposed for conversion; (c) the property proposed for substitution meets the eligibility requirements for LWCF assistance; and (d) replacement property is of at least equal fair market value as established by an appraisal developed in accordance with Federal appraisal standards. Required documentation is similar to that submitted for grant amendment requests. Additional documents include maps identifying the existing 6(f) boundary with the area to be converted, and of the proposed replacement property; and appraisal reports establishing property values.

**Proposal for a Public Facility.** (newly identified requirement) Project sponsors must seek NPS approval to construct public indoor or non-recreation facilities within a Section 6(f) area. In most cases, development of such facilities would constitute a conversion, but, in certain cases NPS may approve them where it can be shown that there will be a net gain in outdoor recreation benefits and enhancements for the entire park. The request comprises the PD/ESF,

which is used to describe the nature of the facility, how it will support and enhance the outdoor recreation use of the site, and ownership and management; as well as a copy of a proposed revised 6(f) map indicating the location of the proposed facility.

**Requests for Temporary Non-Conforming Uses Within Section 6(f)(3) Areas.** (newly identified requirement) Project sponsors must seek NPS approval for the temporary (up to 6 months) use of an LWCF-assisted site for purposes that do not conform to the public outdoor recreation requirement. The State's proposal to NPS must include: (a) the PD/ESF (used to describe the proposed temporary use); (b) SLO recommendations; and (c) an acknowledgement by the SLO that a full conversion will result if the temporary use has not ceased after 6 months.

**Proposal for a Significant Change of Use.** (newly identified requirement) Project sponsors must seek NPS approval to change the use of an assisted site from one eligible use to another when the proposed use significantly contravenes the plans or intent for the area as they were outlined in the original LWCF application for Federal assistance; e.g., changing a site's use from passive to active recreation. The PD/ESF is used for this request.

**Proposal to Shelter Facilities.** (newly identified requirement) Project sponsors must seek NPS approval to construct new or partially or fully enclose an existing outdoor recreation facility, such as a pool or ice rink to shelter them from cold climatic conditions and thereby increase the recreational opportunities. This approval is required whether seeking to use grant funds for this purpose or not. The PD/ESF is used for this request.

**Extension of the 3-year Limit for Delayed Outdoor Recreation Development.** (newly identified requirement) Project sponsors must seek NPS approval to continue a non-recreation use beyond the 3-year limit for acquisition projects that were previously approved with delayed outdoor recreation development. The State must submit a written request and justification for such an extension to NPS before the end of the initial 3-year period. This request must include: (a) a full description of the property's current public outdoor recreation resources and the public's current ability to use the property; and (b) an update of the project sponsor's plans and schedule for developing outdoor recreation facilities on the property.

**Reports.** We use this information provided in reports to ensure that the grantee is accomplishing the work on schedule and to identify any problems that the grantee may be experiencing in accomplishing that work.

- **Onsite Inspection Reports.** (Currently approved under OMB Control Number 1024-0034.) States must administer a regular and continuing program of onsite inspections of projects. Onsite inspection reports are prepared for all inspections conducted and are included in the official project files maintained by the State. Progress onsite inspection reports occur during the project period and are generally combined with the annual performance report or when grant payments are made. Final onsite inspection reports must be submitted to the NPS within 90 days after the date of completing a project and prior to final reimbursement and administrative closeout. Post-completion onsite inspection reports must be completed within 5 years after the final project reimbursement and every 5 years thereafter. If there are problems, the report should include a description of the discrepancy and the corrective action to be taken. Reports indicating problems are forwarded to the NPS for review and necessary action; all other reports are maintained in State files.

- **Financial and Program Performance Reports.** (Currently approved under OMB Control Number 1024-0032.) In accordance with 43 CFR 12 (Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments), grantees must monitor grant and subgrant supported activities to ensure compliance with applicable Federal requirements and that performance goals are being achieved. States must submit reports to NPS at least annually that include performance and financial information.

**Recordkeeping.** (newly identified requirement) In accordance with OMB Circular A-102, States must maintain financial records, supporting documents, statistical records, and all other records pertinent to a grant program for a period of 3 years after final payment on a project. The records must be retained beyond the 3-year period if audit findings have not been resolved.

**Request for Reimbursement/Record of Electronic Payment.** (newly identified requirement) States use the Automated Standard Application for Payments (ASAP) system for drawing funds on approved grants. For planning grants, States must submit to NPS a progress report and request for reimbursement before they may request payments. Acquisition and development projects do not require prior approval, but upon completion of an electronic payment on a given date the State must concurrently (within 24 hours) submit a completed "LWCF Record of Electronic Payment" to the program offices in Washington, DC and their applicable NPS Region.

- 3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

All forms are available on our website in a fillable format. We will accept reports and responses to other requirements electronically by email or in hard copy.

- 4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication. All information collected is project specific for the LWCF State Assistance Program. There may be some duplication of data within this collection when the form is completed for amendments and Conversion of Use Provisions requests. However, this is necessary to ensure that we have accurate, up-to-date information on the project.

- 5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

This collection does not affect small businesses or other small entities.

- 6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

We collect this data to record each project and monitor project status and how funds are being used. Without this data NPS would not have the sufficient overall LWCF program information to quickly report on inquiries or analyze trends in assistance. We only collect the data at the onset of a project, at yearly intervals, or when changes are made to the project; therefore, we could not collect the data less frequently.

- 7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**
- \* requiring respondents to report information to the agency more often than quarterly;**
  - \* requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
  - \* requiring respondents to submit more than an original and two copies of any document;**
  - \* requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
  - \* in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
  - \* requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
  - \* that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
  - \* requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances that would cause us to collect the information in a manner inconsistent with OMB guidelines.

- 8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

**Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

**Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

On February 22, 2013, we published in the Federal Register (78 FR 12349) a notice of our

intent to request that OMB approve this information collection. In that notice, we solicited comments for 60 days, ending on April 23, 2013. We did not receive any comments.

In addition to the Federal Register notice, we consulted with sponsor agencies to validate our estimates. The commenters felt that the burden estimates too narrowly focus on the writing effort, including form preparation if applicable, and would be more accurate if they reflected time spent on activities such as field visits (including travel time), meetings with project sponsors and the public, rounds of review, etc., to the extent that these are necessary to gathering or preparing the information for final submittal to NPS. Also, for certain kind of actions, such as inspections and conversions, a range of estimates could be more accurate. We have revised our estimates (mostly increasing) based on this outreach, but qualify the increase by noting this does not reflect a new requirement compared to past collections, rather a change in the method of assessing what comprises the burden:

Jennifer Scanland Nevada Division of State Parks Parks and Recreation Program Manager Carson City, NV 775-684-2787	Synthia Waymack LWCF Administrator VA Department of Conservation & Recreation Richmond, VA 804.786.4379
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**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

We do not provide payments or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

We do not provide any assurance of confidentiality.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

We do not ask questions of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should:**

- \* **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary**



and usual business practices.

- \* If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.
- \* Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here.

There are a maximum of 56 respondents (States; the Commonwealths of Puerto Rico and the Northern Mariana Islands; the District of Columbia; and the territories of Guam, U.S. Virgin Islands, and American Samoa). We estimate that we will receive 5,944 annual responses totaling 45,454 annual burden hours. Estimated completion times can vary substantially depending on the project. For example, a conversion of use could take from 40 to 500 hours, depending on factors such as how good the historic records for the project are, whether the conversion is controversial, and/or if there are technical difficulties with the process such as finding suitable replacement land. Likewise, the time to complete an onsite inspection report could take from 1.5 to 10 hours, depending on the amount of travel involved. The hours in the table below reflect the average time to complete each requirement.

The total dollar value of the burden hours is approximately \$3,034,055 rounded (\$66.75 x 45,454 hours). We used the Bureau of Labor Statistics Occupational Employment and Wages, May 2012 to determine hourly wages. Table 11-1021 lists the mean hourly wage for a General Manager, local government as \$44.50. To calculate benefits, we multiplied the hourly wage by 1.5 in accordance with news release USDL 13-1835, September 11, 2013, Employer Costs for Employee Compensation—June 2013, resulting in an hourly cost factor of \$66.75.

ACTIVITY	TOTAL ANNUAL RESPONSES	COMPLETION TIME PER RESPONSE (hours)	TOTAL ANNUAL BURDEN HOURS
Statewide Comprehensive Outdoor Recreation Plan	11	500	5,500
Open Project Selection Process	11	20	220
Applications	250	12	3,000
Grant Amendments	180	6	1,080
Conversions of Use	50	150	7,500
Public Facility Requests	8	16	128
Request for Temporary Non-Conforming Uses	5	16	80
Request for a Significant Change of Use	2	16	32
Request to Shelter Facilities	1	16	16
Extension of 3-Year Limit for Delayed Outdoor Recreation Development	5	161	805
Onsite Inspection Reports	4,368	5.5	24,024
Financial and Program Performance Reports	661	1	661
Recordkeeping	56	40	2,240
Requests for Reimbursement/Record of Electronic Payment	336	.5	168
<b>TOTALS</b>	<b>5,944</b>		<b>45,454</b>

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

- \* The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and

disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- \* If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- \* Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no nonhour burden costs.

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.**

We estimate that the annual cost to the Federal Government to administer this information collection is \$656,125 (rounded) (\$46.06 x 14,245). The actual average hourly rate including benefits for staff (GS-9 to GS-12) involved in the review and processing of LWCF documents is \$46.06.

REQUIREMENT	NUMBER OF RESPONSES	TIME PER RESPONSE (hours)	TOTAL HOURS	COST
Statewide Comprehensive Outdoor Recreation Plan	11	20	220	\$ 10,133.20
Open Project Selection Process	11	5	55	2,533.30
Applications	250	10	2,500	115,150.00
Grant Amendments	180	4	720	33,163.20
Conversions of Use	50	16	800	36,848.00
Public Facility Requests	8	10	80	3,684.80
Requests for Temporary Non-Conforming Uses	5	12	60	2,763.60
Request for a Significant Change of Use	2	20	40	1,842.40
Request to Shelter Facilities	1	6	6	276.36
Extension of 3-Year Limit for Delayed Outdoor Recreation Development	5	5	25	1,151.50
Onsite Inspection Reports	4,368	2	8,736	402,380.16
Financial and Program Performance Reports (per grant)	661	.5	331	15,245.86
Requests for Reimbursement/Record of Electronic Payment	336	2	672	30,952.32

<b>TOTAL COST</b>			<b>14,245</b>	<b>\$656,124.70</b>
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**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

We are reporting 5,944 responses totaling 45,454 annual burden hours for this information collection, which is an increase of 5,496 responses and 45,006 burden hours from our last submission.

We are reporting as program changes 435 responses and 17,149 burden hours associated with newly identified requirements that have not been approved previously:

- Applications – 2,000 hours associated with PD/ESF.
- Amendments – 360 hours associated with PD/ESF
- Conversion of Use – 5,600 hours associated with PD/ESF
- SCORP – 11 responses, 5,500 hours
- OPSP – 11 responses, 220 hours
- Public Facility Requests – 8 responses, 128 hours
- Request for Temporary Non-Conforming Use – 5 responses, 80 hours
- Request for Significant Change of Use – 2 responses, 32 hours
- Extension of 3-Year Limit for Delayed Outdoor Recreation Development – 5 responses, 805 hours
- Recordkeeping - 56 responses, 2,240 hours
- Requests for Reimbursement – 336 responses, 168 hours
- Request to Shelter Facilities – 1 response, 16 hours

We are reporting as adjustments a net increase of 5,061 responses and 27,857 hours as follows. These adjustments reflect burden previously approved under other OMB control numbers as well as increased completion times based on outreach.

- Applications - -198 responses, 552 hours for Form 10-902 (previously approved under 1024-0033).
- Amendments – 180 responses, 720 hours for Forms 10-902A (previously approved under 1024-0033) and 10-903 (previously approved under 1024-0031).
- Conversion of Use – 50 responses, 1,900 hours (50 responses, 1,750 hours previously approved under 1024-0047; 150 hours for Form 10-902A previously approved under 1024-0033).
- Onsite Inspection Reports – 4,368 responses, 24,024 hours previously approved under 1024-0034. Response time increased based on outreach.
- Performance Reports – 661 responses, 661 hours – previously approved under 1024-0032.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

We do not publish this information.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

We will display the OMB control number and expiration date on forms and other appropriate materials.

**18. Explain each exception to the certification statement.**

There are no exceptions to the certification statement.